

# EXHIBIT G

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA

3 AKARI JOHNSON and  
4 HAZEL THOMPSON,

5 Plaintiffs, CASE NO.: 4:24-cv-10017-JEM

6 vs.

7 MMI 82, LLC, and  
8 THE ENTHUSIAST LLC,

9 Defendants.  
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11 DEPOSITION OF: VALERIE RENEE FRAPP

12 DATE TAKEN: February 26, 2025

13 TIME: 10 a.m. - 1:40 p.m.

14 PLACE: Everyone appeared remotely  
15 via Zoom

16 REPORTED BY: MELISSA FERNANDEZ  
17 Court Stenographer  
18

1 A I did my best.

2 Q Could you please explain what you mean by that?

3 A So at Casa Morada there was like a flood where the  
4 water had came through into the back office and there's lots of  
5 documents that had been stuck together, like I was trying to  
6 look for some papers but if it had rained on some papers like  
7 if you tried to pull them apart you couldn't. Everything on  
8 the paper would be blurred from the water damage and so that's  
9 why I'm saying. I did the best I could. There were so many  
10 papers and they were destroyed. You couldn't tell what you  
11 were looking at they were so stuck together.

12 Q When you say the documents were destroyed is it the  
13 hurricane had hit the building?

14 A I don't know what that would look like because I'm  
15 not from Florida so I don't know how a hurricane hitting would  
16 make it look but to me it would be like if the river out here  
17 at Tapoco overflowed and came in the office and got up in the  
18 filing cabinet how it would stick everything together. So to  
19 me it looked like flood water or if the roof fell in and the  
20 rain was coming in.

21 Q Okay. I'm going to go ahead and show you what I'm  
22 marking as Plaintiff's 3.

23 (Whereupon, Plaintiff's Exhibit 3 was marked for  
24 identification.)

25 BY MR. BARROUKH:

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that VALERIE RENEE  
FRAPP remotely appeared before me and was duly sworn.

WITNESS my hand and official seal this 26th day of  
February, 2025.

*Melissa Fernandez*

MELISSA FERNANDEZ

Notary Public - State of Florida

Commission No.: HH 278990

My Commission Expires: 6/21/2026

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, MELISSA FERNANDEZ, Court Reporter, certify  
that I was authorized to and did stenographically report  
the foregoing deposition, and that the transcript is  
a true record of the stenographic notes.

I further certify that I am not a relative,  
employee, attorney, or counsel of any of the parties,  
nor am I a relative or employee of any of the parties'  
attorney or counsel connected with the action, nor am  
I financially interested in the action.

Dated this 27th day of May, 2025.

*Melissa Fernandez*

MELISSA FERNANDEZ  
Court Stenographer